

## UNITED STATES DISTRICT COURT

for the  
 District of \_\_\_\_\_  
 \_\_\_\_\_ Division

Filed	Received	Entered	Served On
Counsel/Parties of Record			
SEP 13 2023			
Clerk US District Court			
District of Nevada			
By:	Deputy		

3:23-CV-00447

(to be filled in by the Clerk's Office)

Walter S England

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Reno Police Department,  
Christian Hout, City of Reno,

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Amendment

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address

Walter England  
136 West 2nd St Apt 212  
Reno, Washoe County  
NV, 89501  
(916) 517-7893  
SacramentoCommunitywatch@gmail.com

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## Defendant No. 1

Name  
Job or Title (*if known*)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (*if known*)

Christian Hoyt  
Reno Police Department  
455 E 2nd St  
Reno, Washoe  
NV, 89502  
(775) 334-2121  
askr.pd@reno.gov

## Defendant No. 2

Name  
Job or Title (*if known*)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (*if known*)

city of Reno  
city government

## Defendant No. 3

Name  
Job or Title (*if known*)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (*if known*)

Reno Police Department  
Reno PD  
455 E 2nd St  
Reno, Washoe  
NV, 89502  
(775) 334-2121  
askrpd@reno.gov

## Defendant No. 4

Name  
Job or Title (*if known*)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (*if known*)

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

### A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

US Constitution. 1st Amendment Violation, 4th Amendment Violation  
Violation of 18 U.S.C. 242

### B. If the Basis for Jurisdiction Is Diversity of Citizenship

#### 1. The Plaintiff(s)

##### a. If the plaintiff is an individual

The plaintiff, (name) Walter England, is a citizen of the State of (name) Nevada.

##### b. If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

#### 2. The Defendant(s)

##### a. If the defendant is an individual

The defendant, (name) Christian Hoyt, is a citizen of the State of (name) NV. Or is a citizen of (foreign nation) \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, (name) City of Reno, Reno PD, is incorporated under the laws of the State of (name) NV, and has its principal place of business in the State of (name) NV.

Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Violation of Rights 1st, ~~4th~~ 4th Amendments

Violation of 18 U.S.C. 242, Violation of NRS 171.1233

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

The officer violated my rights on August 22 while he was sitting in a City owned Patrol Vehicle. The officer advised on video that he was engaged in a "private" call and to step away from his "Vehicle, within seconds I was arrested and taken to Washoe County and booked for a and Relief R.

### IV.

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I expect the officer, City of Reno and Reno Police Department to Cover all cost and I Demand 2 million for the Violation Of my rights and the NRS Code violation as well as the Deprivation of rights under the Color of Law I will and should Pay \$0.00!

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

9/13/23

Signature of Plaintiff

Walter England

Printed Name of Plaintiff

Walter England**B. For Attorneys**

Date of signing:

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Signature of Attorney

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Printed Name of Attorney

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Bar Number

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Name of Law Firm

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Street Address

---

State and Zip Code

---

Telephone Number

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E-mail Address

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